

Facility Name: **Buckeye SE Terminals, L.P. – Doraville II Terminal**
City: Doraville
County: DeKalb
AIRS #: 04-13-089-000121

Application #: TV-640191 and 28487
Date Application Received: February 25, 2022 and June 20, 2022
Permit No: 5171-089-0121-V-06-0

Program	Review Engineers	Review Managers
SSPP	S. Ganapathy	Hamid Yavari
ISMU	Bob Scott	Dan McCain
SSCP	Taylor Crocker	Tammy Martiny
Toxics	n/a	n/a
Permitting Program Manager		Stephen Damaske

Introduction

This narrative is being provided to assist the reader in understanding the content of referenced operating permit. Complex issues and unusual items are explained here in simpler terms and/or greater detail than is sometimes possible in the actual permit. The permit is being issued pursuant to: (1) Georgia Air Quality Act, O.C.G.A § 12-9-1, et seq. and (2) Georgia Rules for Air Quality Control, Chapter 391-3-1, and (3) Title V of the Clean Air Act. Section 391-3-1-.03(10) of the Georgia Rules for Air Quality Control incorporates requirements of Part 70 of Title 40 of the Code of Federal Regulations promulgated pursuant to the Federal Clean Air Act. The narrative is intended as an adjunct for the reviewer and to provide information only. It has no legal standing. Any revisions made to the permit in response to comments received during the public participation and EPA review process will be described in an addendum to this narrative.

I. Facility Description

A. Facility Identification

1. Facility Name: Buckeye SE Terminals, LP – Doraville II Terminal

2. Parent/Holding Company Name

Buckeye SE Terminals, LP

3. Previous and/or Other Name(s)

Southern Facilities till June 1991

Conoco, Inc. till August 2004

Magellan Terminals Holdings, L.P. – Doraville II Terminal

4. Facility Location

2797 Woodwin Road, Doraville, Georgia 30360 (DeKalb County)

5. Attainment, Non-attainment Area Location, or Contributing Area

The terminal is located within the Atlanta Ozone Marginal Nonattainment and the Atlanta PM_{2.5} Maintenance areas (re-designated on August 3, 2018 (Ozone) and February 24, 2016 (PM_{2.5})).

B. Site Determination

There are no other facilities which could possibly be contiguous or adjacent and under common control.

C. Existing Permits

Table 1 below lists all current Title V permits, all amendments, 502(b)(10) changes, and off-permit changes, issued to the facility, based on a comparative review of form A.6, Current Permits, of the Title V application and the "Permit" file(s) on the facility found in the Air Branch office.

Table 1: List of Current Permits, Amendments, and Off-Permit Changes

Permit Number and/or Off-Permit Change	Date of Issuance/Effectiveness	Purpose of Issuance
5171-089-0121-V-05-0	September 1, 2017	Title V Permit Renewal
Off-Permit Change	February 2, 2018	Installation and operation of new piping with in-line static mixers and a new pump to blend sub-octane grade gasoline (V-rade used to blend with Ethanol) into the premium gasoline to lower the premium octane.
Off-Permit Change	February 8, 2018	Installation and operation of new piping with in-line static mixers and a new pump to blend sub-

		octane grade gasoline (V-rade used to blend with Ethanol) into the premium gasoline to lower the premium octane.
Off-Permit Change	November 12, 2019	Add natural gasoline blending from truck to tank.
Off-Permit Change	November 11, 2022	Install add'l loading arms on existing loading rack (ID No.D020)

D. Process Description

1. SIC Codes(s)

5171 - Petroleum Bulk Stations and Terminals

The SIC Code(s) identified above were assigned by EPD's Air Protection Branch for purposes pursuant to the Georgia Air Quality Act and related administrative purposes only and are not intended to be used for any other purpose. Assignment of SIC Codes by EPD's Air Protection Branch for these purposes does not prohibit the facility from using these or different SIC Codes for other regulatory and non-regulatory purposes.

Should the reference(s) to SIC Code(s) in any narratives or narrative addendum previously issued for the Title V permit for this facility conflict with the revised language herein, the language herein shall control; provided, however, language in previously issued narratives that does not expressly reference SIC Code(s) shall not be affected.

2. Description of Product(s)

The products handled by this include, gasoline, distillate oil, ethanol and gasoline and distillate oil additives.

3. Overall Facility Process Description

Petroleum products such as diesel fuel and gasoline are received by pipeline and stored in one of nine large storage tanks at the facility. Seven tanks have internal floating roofs and two have fixed roofs. The floating roof tanks are allowed to store gasoline or less volatile products. The fixed roof tanks may only store less volatile products such as diesel fuel and kerosene. Three other small tanks, having capacities of 10,000 gallons or less, are located at the site and are used for additive storage. Products from the storage tanks are dispensed to tanker trucks through loading racks. Emissions from this operation are controlled by a vapor recovery unit (VRU) or a vapor combustor unit (VCU). This facility has also been permitted to store and handle ethanol.

4. Overall Process Flow Diagram

The facility provided a process flow diagram in their Title V permit application.

E. Regulatory Status

1. PSD/NSR

Buckeye SE Terminals - Doraville II Terminal is currently classified as a major source of VOC in the Atlanta Ozone non-attainment area. Total tank storage at this facility is approximately 15 million gallons which is equal to about 360,000 barrels. PSD regulations name petroleum storage facilities with total capacities of greater than 300,000 barrels as one of the 28 named categories of sources whose annual emissions make them a PSD major source if they exceed 100 tons. Potential annual emissions of VOCs from this source have been calculated to be 171.6 tons.

This facility would be considered a major source under PSD regulations; however, this facility is located in DeKalb County which is part of the metro Atlanta ozone non-attainment area. Therefore, the NSR regulations would be applicable instead of PSD, since VOCs are the major pollutant emitted and this is one of the two pollutants regulated for ozone non-attainment areas. Buckeye would be considered major for NSR purposes since their potential VOC emissions exceed 100 tons per year. Their nitrogen oxide emissions, however, are less than 25 tons per year. Nitrogen oxide is the second pollutant regulated for ozone non-attainment areas. The facility is a minor source with respect to PSD and Title V for all other pollutants.

2. Title V Major Source Status by Pollutant

Table 2: Title V Major Source Status

Pollutant	Is the Pollutant Emitted?	If emitted, what is the facility's Title V status for the pollutant?		
		Major Source Status	Major Source Requesting SM Status	Non-Major Source Status
PM	Yes			✓
PM ₁₀	Yes			✓
PM _{2.5}	Yes			✓
SO ₂	Yes			✓
VOC	Yes	✓		
NO _x	Yes			✓
CO	Yes			✓
TRS	n/a			
H ₂ S	n/a			
Individual HAP	Yes			✓
Total HAPs	Yes			✓

3. MACT Standards

The facility is subject to 40 CFR 63 Subpart BBBBBB – “National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities.”

4. Program Applicability (AIRS Program Codes)

Program Code	Applicable (y/n)
Program Code 6 - PSD	No
Program Code 8 – Part 61 NESHAP	No
Program Code 9 - NSPS	Yes
Program Code M – Part 63 NESHAP	Yes
Program Code V – Title V	Yes

Regulatory Analysis

II. Facility Wide Requirements

A. Emission and Operating Caps:

None applicable.

B. Applicable Rules and Regulations

Not applicable.

C. Compliance Status

The facility is operating in compliance with the rules and regulations.

D. Permit Conditions

None

III. Regulated Equipment Requirements

A. Equipment List for the Process

Emission Units		Applicable Requirements/Standards	Air Pollution Control Devices	
ID No.	Description		ID No.	Description
D001	Internal Floating Roof Tank	391-3-1-.02(2)(bb) 40 CFR 63 Subparts A & BBBBBB		Internal Floating Roof Single seal, vapor mounted
D002	Internal Floating Roof Tank	391-3-1-.02(2)(bb) 40 CFR 63 Subparts A & BBBBBB		Internal Floating Roof with secondary wiper
D005	Internal Floating Roof Tank	391-3-1-.02(2)(bb) 40 CFR 63 Subpart A & BBBBBB		Internal Floating Roof with secondary wiper
D006	Internal Floating Roof Tank	391-3-1-.02(2)(bb) 40 CFR 63 Subparts A & BBBBBB		Internal Floating Roof Single seal, vapor mounted
D008	Internal Floating Roof Tank	391-3-1-.02(2)(bb) 40 CFR 63 Subparts A & BBBBBB		Internal Floating Roof with secondary wiper
D009	Internal Floating Roof Tank	391-3-1-.02(2)(bb) 40 CFR 63 Subparts A & BBBBBB		Internal Floating Roof with secondary wiper
D010	Internal Floating Roof Tank	391-3-1-.02(2)(bb) 40 CFR 63 Subparts A & BBBBBB		Internal Floating Roof with secondary wiper
D023	Floating Roof Landings	391-3-1-.02(2)(bb) 40 CFR 63 Subparts A & BBBBBB	-	-
TKC	Tank Cleanings	391-3-1-.02(2)(bb) 40 CFR 63 Subparts A & BBBBBB		
D020	Tank Truck Loading Rack	391-3-1-.02(2)(cc) 391-3-1-.02(2)(ss) 40 CFR 60 Subparts A & XX 40 CFR 63 Subpart As & BBBBBB	D024	Vapor Recovery Unit (VRU primary control)
			D021	Vapor Combustion Unit (VCU secondary/backup control)

B. Equipment & Rule Applicability

40 CFR 60 Subpart XX – “Standards of Performance for Bulk Gasoline Terminals,” applies to any gasoline terminal constructed or modified after December 17, 1980. Having modified the terminal after this date, Buckeye must meet the emission limit for this regulation of 35 mg. (of VOCs) per liter of gasoline loaded. In addition to the emission limit, this regulation requires certain equipment standards to ensure a vapor tight loading system and requires that the terminal only load gasoline into tanks that have been tested and shown to be vapor tight. Recordkeeping ensuring compliance with these requirements is also required.

The facility is subject to 40 CFR 63 Subpart BBBB – “National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities.” The facility shall comply with the applicable operating, monitoring, testing, inspection, maintenance and recordkeeping and reporting requirements of this regulation.

Georgia Rule (bb) – “Petroleum Liquid Storage,” applies to tanks D001, D002, D005, D006, D008, D009 and D010, since each of these tanks has a capacity of more than 40,000 gallons and is capable of storing a product with a vapor pressure of greater than 1.52 psia. Rule (bb) requires that these tanks be equipped with floating roofs. The other tanks at this facility, which have volumes of greater than 40,000 gallons, Tanks D003 and D004, have only fixed roofs and may not store the volatile products that would subject it to this Rule.

Georgia Rule (cc) - “Bulk Gasoline Terminals,” applies to all gasoline terminals in the State and covers the terminal or loading rack portion of this facility. Gasoline terminal is defined in the Rule as a facility, which receives gasoline by pipeline, dispenses it to trucks and has an average daily throughput of greater than 20,000 gallons. Buckeye meets all of these criteria and must therefore have a control system with an efficiency of at least 90 percent. Although this Rule also mandates a maximum emission rate of no more than 80 mg. per liter of gasoline loaded at the terminal, this emission limit is superseded by the 35 mg. per liter standard of the NSPS regulation to which this facility is also subject.

Georgia Rule (ss) - “Gasoline Transport Vehicles and Vapor Collection Systems,” applies to any entity involved in the loading or unloading of gasoline into gasoline transport vehicles, which is Buckeye's primary business at this facility. Buckeye must, therefore, take steps to ensure that they only load gasoline into tanker trucks that have passed a vapor tightness test to ensure that they do not leak. This Rule is also automatically applicable to any facility that is subject to Rule (cc).

C. Permit Conditions

Condition 3.2.1, requires a 90 percent control efficiency for the control device, the vapor recovery unit (VRU) or vapor combustion unit (VCU), in accordance with Georgia Rule (cc). This condition has been carried over into this permit without any changes.

Condition 3.2.2, stating that the VRU is the primary control device and the VCU is the secondary control device, has been carried over into this permit without any changes.

Condition 3.3.1, requiring that gasoline only be loaded into vapor tight trucks in accordance with 40 CFR 60 Subpart XX and 40 CFR 63 Subpart BBBB, has been carried over from the existing Title V permit without any changes.

Condition 3.3.2, limiting emissions from the vapor control system to 35 mg. per liter of gasoline loaded in accordance with 40 CFR 60 Subpart XX, has been carried over into this permit without any changes.

Condition 3.3.1, requiring that gasoline only be loaded into vapor tight trucks in accordance with 40 CFR 60 Subpart XX and 40 CFR 63 Subpart BBBB, has been carried over from the existing Title V permit without any changes.

Condition 3.3.2, limiting emissions from the vapor control system to 35 mg. per liter of gasoline loaded in accordance with 40 CFR 60 Subpart XX, is carried over into this permit without any changes.

Conditions 3.3.3 through 3.3.7, stating the applicable emissions and performance standards as required by 40 CFR 63 Subpart BBBB, have been carried over from the existing Title V permit without any changes.

Condition 3.4.1, which is a State only enforceable condition requiring the facility to use paint of a heat-reflective nature when repainting tanks, has been carried over from the existing Title V permit without any changes.

Condition 3.4.2, requiring the facility to comply with the requirements of Georgia Rule (bb), has been carried over from the existing Title V permit without any changes.

Condition 3.4.3, requiring the facility to comply with the requirements of Georgia Rule (cc), has been carried over from the existing Title V permit without any changes.

Condition 3.4.4, requiring the facility to comply with the requirements of Georgia Rule (ss), has been carried over from the existing Title V permit without any changes.

Condition 3.5.1, requiring the facility to perform routine maintenance on all air pollution control equipment, has been carried over from the existing Title V permit without any changes.

Condition 3.5.2, requiring the facility to keep an inventory of spare parts for the control equipment, has been carried over from the existing Title V permit without any changes.

IV. Testing Requirements (with Associated Record Keeping and Reporting)

A. General Testing Requirements

The permit includes a requirement that the Permittee conduct performance testing on any specified emission unit when directed by the Division. Additionally, a written notification of any performance test(s) is required 30 days (or sixty (60) days for tests required by 40 CFR Part 63) prior to the date of the test(s) and a test plan is required to be submitted with the test notification. Test methods and procedures for determining compliance with applicable emission limitations are listed and test results are required to be submitted to the Division within 60 days of completion of the testing.

B. Specific Testing Requirements

Condition 4.2.1, which requires Buckeye to establish parameter operating ranges for performance tests in accordance with 40 CFR 63 Subpart BBBBBB, has been carried over from the existing Title V permit.

V. Monitoring Requirements

A. General Monitoring Requirements

Condition 5.1.1 requires that all continuous monitoring systems required by the Division be operated continuously except during monitoring system breakdowns and repairs. Monitoring system response during quality assurance activities is required to be measured and recorded. Maintenance or repair is required to be conducted in an expeditious manner.

B. Specific Monitoring Requirements

Condition 5.2.1, requiring a monitoring device to detect the presence of a flame at the vapor combustor unit (VCU) when the VCU was being used as the primary control device, has been carried over into this permit without any changes.

Condition 5.2.2, requiring monthly leak inspections in accordance with 40 CFR 60 Subpart XX and 40 CFR 63 Subpart BBBBBB, has been carried over from the existing Title V permit without any changes.

Conditions 5.2.3 and 5.2.4 of the current permit contain the CAM monitoring requirements. This condition is not carried out into the renewal permit since the loading rack is already subject to specific monitoring requirements in NESHAP Subpart BBBBBB (dated January 2008),¹ and is therefore not subject to CAM requirements of 40 CFR 64 because of the exemption found in §64.2(b)(1) which includes “*Emission limitations or standards proposed by the Administrator after November 15, 1990 pursuant to section 111 or 112 of the Act.*”.

¹ The VRU continuous monitoring requirements include a hydrocarbon CEMS; the VCU monitoring requirements include continuous monitoring of pilot flame presence.

MTH will continue to comply with the NESHAP Subpart BBBBBBB requirements and the CAM requirements in these conditions have been superseded with the NESHAPs requirements that are more stringent than the CAM requirements. Therefore, there is no need for these CAM conditions in the facilities Title V permit. Therefore, these two conditions were excluded from the renewal Title V permit. The remaining conditions in Section 5.2 have been renumbered and carried over into the Title V renewal permit.

Conditions 5.2.3, 5.2.4, and 5.2.5, containing 40 CFR 63 Subpart BBBBBBB inspection requirements for internal floating roof tanks, have been carried over from the existing Title V permit with change in the permit condition numbers.

Condition 5.2.6, requiring the facility to install, operate, and maintain an interlock system to prevent gasoline loading operations, has been carried over into this permit with the breakthrough value changed from 1.0 percent as propane to 1.75 percent to be consistent with permits issued to similar facilities.

Condition 5.2.7, requiring the facility to install a device to continuously track the vapor staging valves position as part of interlock system, has been carried over into this permit with change in the condition number.

Condition 5.2.8, requiring the facility to install a CEMS to monitor the average hydrocarbon concentration at the exit of the VRU, has been carried over into this permit with the breakthrough value changed from 1.0 percent as propane to 1.75 percent to be consistent with permits issued to similar facilities.

C. Compliance Assurance Monitoring (CAM)

40 CFR Part 64 – Compliance Assurance Monitoring (CAM) rule exempts emission sources subject to emission limitations or standards proposed by EPA after November 15, 1990 pursuant to 111 or 112 of CAA. Since the VRU is subject to specific monitoring requirements under 40 CFR 63 Subpart BBBBBBB which was proposed after November 15, 1990, the VRU is not subject to CAM requirements. Therefore, Conditions 5.2.3 and 5.2.4 in the current Title V permit containing the applicable CAM monitoring requirements for the VCU and are not carried over into this Title V permit.

VI. Record Keeping and Reporting Requirements**A. General Record Keeping and Reporting Requirements**

The Permit contains general requirements for the maintenance of all records for a period of five years following the date of entry and requires the prompt reporting of all information related to deviations from the applicable requirements. Records, including identification of any excess emissions, exceedances, or excursions from the applicable monitoring triggers, the cause of such occurrence, and the corrective action taken, are required to be kept by the Permittee and reporting is required on a [quarterly or semiannual] basis.

B. Specific Record Keeping and Reporting Requirements

Condition 6.2.1, requiring the facility to keep record of any shutdowns, malfunctions, and subsequent maintenance on the vapor control system, has been carried over into this permit without any changes.

Condition 6.2.2, requiring the facility to keep vapor tightness documentation in accordance with Georgia Rule (ss), 40 CFR 60 Subpart XX, and 40 CFR 63 Subpart BBBB, has been carried over from the existing Title V permit without any changes.

Condition 6.2.3, requiring the logging of the leak inspections in accordance with 40 CFR 60 Subpart XX and 40 CFR 63 Subpart BBBB, has been carried over from the existing Title V permit without any changes.

Conditions 6.2.4 through 6.2.8, containing recordkeeping and reporting requirements in accordance with 40 CFR 63 Subpart BBBB, have been carried over from the existing Title V permit without any changes.

VII. Specific Requirements**A. Operational Flexibility**

Not applicable.

B. Alternative Requirements

Not applicable.

C. Insignificant Activities

See Permit Application on GEOS website.
See Attachment B of the permit

D. Temporary Sources

Not applicable.

E. Short-Term Activities

Not applicable.

F. Compliance Schedule/Progress Reports

Not applicable.

G. Emissions Trading

Not applicable.

H. Acid Rain Requirements

Not applicable.

I. Stratospheric Ozone Protection Requirements

Not applicable.

J. Pollution Prevention

Not applicable.

K. Specific Conditions

Not applicable.

VIII. General Provisions

Generic provisions have been included in this permit to address the requirements in 40 CFR Part 70 that apply to all Title V sources, and the requirements in Chapter 391-3-1 of the Georgia Rules for Air Quality Control that apply to all stationary sources of air pollution.

Template Condition 8.14.1 was updated in September 2011 to change the default submittal deadline for Annual Compliance Certifications to February 28.

Template Condition Section 8.27 was updated in August 2014 to include more detailed, clear requirements for emergency generator engines currently exempt from SIP permitting and considered insignificant sources in the Title V permit.

Template Condition Section 8.28 was updated in August 2014 to more clearly define the applicability of the Boiler MACT or GACT for major or minor sources of HAP.

Addendum to Narrative

The 30-day public review started on month day, year and ended on month day, year. Comments were/were not received by the Division.

//If comments were received, state the commenter, the date the comments were received in the above paragraph. All explanations of any changes should be addressed below.//